

SEP 09 2015

SECRETARY, BOARD OF
OIL, GAS & MINING

**BEFORE THE BOARD OF OIL, GAS AND MINING
DEPARTMENT OF NATURAL RESOURCES
STATE OF UTAH**

**IN THE MATTER OF THE REQUEST FOR
AGENCY ACTION OF CRESCENT POINT
ENERGY U.S. CORPORATION FOR AN
ORDER: (1) PARTIALLY VACATING THE
BOARD'S ORDER IN DOCKET NO. 2011-012,
CAUSE NO. 142-05 AS TO CERTAIN LANDS;
(2) VACATING THE BOARD'S ORDER IN
DOCKET NO. 2104-023, CAUSE NO. 131-138;
AND (3) ESTABLISHING VERTICAL 640-
ACRE AND 1,280 ACRE DRILLING UNITS
FOR THE PRODUCTION OF OIL, GAS AND
ASSOCIATED HYDROCARBONS FROM
THE LOWER GREEN RIVER AND GREEN
RIVER-WASATCH FORMATIONS IN
PORTIONS OF TOWNSHIPS 3 AND 4
SOUTH, RANGES 1 AND 2 EAST, U.S.M.,
UINTAH COUNTY, UTAH**

REQUEST FOR AGENCY ACTION

Docket No. 2015-026

Cause No. 131-141

COMES NOW, Crescent Point Energy U.S. Corporation ("CPE"), by and through its attorneys Fox Rothschild LLP, and pursuant to Utah Code Ann. § § 40-6-5(3)(b) and 40-6-6, and hereby respectfully requests that the State of Utah Board of Oil, Gas and Mining ("Board") enter an order: (1) partially vacating the Findings of Fact, Conclusions of Law and Order Allowing In-Fill Wells in Docket No. 2011-012, Cause No. 142-05 dated effective August 24, 2011 ("Board Order No. 142-05"); (2) vacating the Findings of Fact, Conclusions of Law and Order in Docket No. 2014-023, Cause No. 131-138 dated effective July 23, 2014 ("Board Order No. 131-138"); and (3) establishing 640-acre drilling units and 1,280-acre drilling units for the production of oil, gas and other hydrocarbons from the Lower Green River and Green River-Wasatch Formations, defined for purposes of this Request for Agency Action ("RAA") as:

The interval from the top of the Lower Green River Formation (TGR₃) to the base of the Green River-Wasatch Formation (top of Cretaceous), which base is defined as the stratigraphic equivalent of the Dual Induction Log depths of 16,720 feet in the Shell-Ute 1-18B5 Well, located in the S/2NE/4, Section 18, Township 2 South, Range 5 West, U.S.M., and 16,970 feet in the Shell-Brotherson 1-11B4 Well, located in the S/2NE/4, Section 11, Township 2 South, Range 4 West, U.S.M. (collectively, "Subject Formations").

Specifically, CPE's request herein extends to: (i) the establishment of forty-nine (49) six hundred forty (640) acre (or the substantial equivalent) drilling units, comprised of the following lands located in Uintah County, Utah (each governmental section a "640 DU," and collectively, "640 DU Lands"):

Township 3 South, Range 1 East, USM

Section 1:	All
Section 2:	All
Section 3:	All
Section 4:	All
Section 5:	All
Section 6:	All
Section 10:	All
Section 11:	All
Section 12:	All
Section 13:	All
Section 14:	All
Section 15:	All
Section 18:	All
Section 19:	All
Section 20:	All
Section 21:	All
Section 22:	All
Section 29:	All
Section 30:	All
Section 31:	All
Section 32:	All
Section 33:	All

Township 3 South, Range 2 East, USM

Section 4: All
Section 5: All
Section 6: All
Section 7: All
Section 8: All
Section 9: All
Section 16: All
Section 17: All
Section 18: All
Section 20: All
Section 21: All
Section 22: All
Section 26: All
Section 27: All
Section 28: All
Section 33: All
Section 34: All
Section 35: All

Township 4 South, Range 2 East, USM

Section 1: All
Section 2: All
Section 3: All
Section 4: All
Section 10: All
Section 12: All
Section 13: All
Section 18: All
Section 19: All

and (ii) the establishment of eighteen (18) one thousand two hundred eighty (1,280) acre vertically-oriented drilling units (or the substantial equivalent) comprised of the following lands located in Uintah County, Utah (each two (2) governmental sections a “1,280 DU,” and collectively, “1,280 DU Lands”):

Township 3 South, Range 1 East, U.S.M.

Sections 1 and 12: All
Sections 2 and 11: All
Sections 3 and 10: All
Sections 15 and 22: All
Sections 18 and 19: All
Sections 20 and 28: All

Sections 30 and 31: All

Township 3 South, Range 2 East, USM

Sections 4 and 9: All

Sections 5 and 8: All

Sections 6 and 7: All

Sections 16 and 21: All

Sections 17 and 20: All

Sections 22 and 27: All

Sections 26 and 35: All

Sections 28 and 33: All

Township 4 South, Range 2 East, USM

Sections 1 and 12: All

Sections 18 and 19: All

Township 3-4 South, Range 2 East, USM

Sections 34¹ and 3²: All

For purposes of this RAA, the 1,280 DU Lands and 640 DU Lands are referred to collectively as the “Subject Lands.” CPE’s request herein concerning the Subject Lands, with respect to the Subject Formations, is subject to, among other things, the following:

A. A maximum of sixteen (16) vertical wells may be drilled and produced from the Subject Formations in each 640 DU so established (each a “V Well”);

B. A maximum of thirty-two (32) V Wells may be drilled and produced from the Subject Formations in each 1,280 DU so established to be concurrent with, and not in addition to, any Vertical Wells (as defined below) and V Wells drilled in each 1,280 DU so established;

C. A maximum of twelve (12) short lateral horizontal wells may be drilled and produced from the Subject Formations in each 640 DU so established, to be concurrent with, and not in addition to, any Horizontal Wells (as defined below) drilled in each 640 DU so established (each an “SLHZ Well”);

¹ Township 3 South, Range 2 East, USM

² Township 4 South, Range 2 East, USM

D. A maximum of twelve (12) long lateral horizontal wells may be drilled and produced from the Subject Formations in each 1,280 DU so established, to be concurrent with, and not in addition to, any Horizontal Wells (as defined below) and SLHZ Wells drilled in each 1,280 DU so established (each an “LLHZ Well”);

E. V Wells drilled and produced within each 640 DU and/or 1,280 DU so established shall be drilled and produced pursuant to the Rules of the Board and the Utah Division of Oil, Gas and Mining (collectively, “UDOGM Rules”), including UDOGM Rule R649-3-2, which provides that a V Well may be located in the center of any governmental quarter-quarter section, with a four hundred foot (400’) window of tolerance and no closer than nine hundred twenty feet (920’) to another vertical well producing in the same formation, absent an exception location approval by the Board pursuant to UDOGM Rule R649-3-3;

F. No producing interval of an authorized SLHZ Well wellbore or LLHZ Well wellbore may be located: (a) closer than three hundred thirty feet (330’) laterally from the north and south boundaries of each 640 DU or 1,280 DU so established; (b) closer than five hundred sixty feet (560’) laterally from the east and west boundaries of each 640 DU or 1,280 DU so established; or (c) closer than three hundred thirty feet (330’) laterally from the producing interval of any authorized Existing Well wellbore (as defined below), V Well wellbore, SLHZ Well wellbore or LLHZ Well wellbore within the same 640 DU or 1,280 DU, absent an exception location approval by the Board pursuant to UDOGM Rule R649-3-3;

G. Authorization that “stacked” SLHZ Well wellbores and LLHZ Well wellbores within any 640 DU or 1,280 DU so established shall have no interwell setback distance laterally within the subject 640 DU or 1,280 DU, but no producing interval of an authorized SLHZ Well wellbore or LLHZ Well wellbore within such 640 DU or 1,280 DU may be located closer than

one hundred feet (100') vertically from the producing interval of another authorized "stacked" SLHZ Well wellbore or LLHZ Well wellbore within such 640 DU or 1,280 DU, absent an exception location approval by the Board pursuant to UDOGM Rule R649-3-3;

H. The surface location of any authorized V Well, SLHZ Well or LLHZ Well may be located: (a) anywhere within any 640 DU or 1,280 DU so established or (b) (excepting V Wells) outside of such 640 DU or 1,280 DU so established, in either case subject to the acquisition of proper surface and subsurface estate authorizations and the casing/cementing of any SLHZ Well wellbore or LLHZ Well wellbore to the three hundred thirty foot (330') setback set forth in Paragraph F above, both of which shall be evidenced by a self-certification of the same executed by the operator of such 640 DU or 1,280 DU and filed with the Utah Division of Oil, Gas and Mining ("Division"), and provided that the other setbacks set forth in Paragraph F above are otherwise maintained;

I. The effectiveness of any order of the Board issued pursuant to this RAA: (a) on the date of issuance of the same with respect to V Wells, SLHZ Wells, LLHZ Wells and Horizontal Wells (as defined below) and (b) on the date in which a SLHZ Well or LLHZ Well is drilled and obtains production in commercial quantities in a subject 640 DU or 1,280 DU with respect to Vertical Wells (as defined below); and

J. The Subject Formations constituting a "common source of supply" as defined in Utah Code Ann. § 40-6-2(18).

In support of this RAA, CPE states, represents and alleges as follows:

1. CPE is a Delaware corporation with its principal place of business in Denver, Colorado.

2. CPE is duly qualified to conduct business in the State of Utah.

3. CPE is fully and appropriately bonded as required by all relevant Federal, Tribal and State of Utah governmental agencies.

4. The oil, gas and other hydrocarbons within the Subject Lands are subject to numerous oil and gas leases, of which CPE is a working interest owner.

5. Portions of the Subject Lands are currently subject to the following orders of the Board establishing drilling units for the Subject Formations (collectively, "Existing Orders"):

(a). Pursuant to Board Order No. 142-05,³ the Board allowed the drilling of up to two (2) vertical wells in previously-established eighty (80) acre drilling units covering a portion of the Subject Lands (NW/4, Section 33, Township 3 South, Range 2 East, U.S.M.; "Order 142-05 Lands") for the production of oil, gas and associated hydrocarbons from the Subject Formations, defined therein as follows:

That interval between the stratigraphic equivalent of 5,858 feet as shown on the induction log of the Knight 14-30 well, located in the SE/4SW/4 of Section 30, Township 3 South, Range 2 East, U.S.M, and the stratigraphic equivalent of 7,610 feet as shown on the Laterolog of the Gulf Randlett #2 Well, located in the SW/4SE/4 of Section 31, Township 3 South, Range 2 East, U.S.M.

(b). Pursuant to Board Order No. 131-138, the Board allowed the drilling of up to six (6) horizontal wells in each of the following established drilling units: (i) two (2) six hundred forty (640) acre drilling units covering a portion of the Subject Lands (All of Section 18, Township 3 South, Range 1 East, U.S.M. and All of Section 10, Township 4 South, Range 2 East, U.S.M.) and (ii) two (2) one thousand two hundred eighty (1,280) acre drilling units covering other portions of the Subject Lands (All of Sections 20 and 29, Township 3 South,

³ Modifying the Board's Findings of Fact, Conclusions of Law and Order in Docket No. 2007-017, Cause No. 142-03 dated effective July 17, 2008, which, among other things, established horizontally-oriented eighty (80) acre drilling units for the production of oil, gas and associated hydrocarbons by a single well from the Subject Formations, as defined therein.

Range 1 East, U.S.M. and All of Sections 22 and 27, Township 3 South, Range 2 East, U.S.M.) (collectively, "Order 131-138 Lands"), for the production of oil, gas and associated hydrocarbons from the Subject Formations, defined therein as follows:

That interval below the stratigraphic equivalent of 9,600 feet depth in the "E" log of the Carter #2 Bluebell Well located in the SW/4NW/4, Section 3, Township 1 South, Range 2 West, U.S.M. (which equivalence is the depth 9,530 feet of the SP curve, Dual Induction Log, run March 15, 1968, in the Chevron #1 Blanchard Well, located in the NW/4SE/4 of said [Section 3]), to the base of the Green River-Wasatch Formations, which 9,600-foot depth is equivalent to 5,955 feet in CPE's Randlett Gavitte 13-23-3-1E Well, located in the SW/4SW/4 of Section 23, Township 3 South, Range 1 East

6. As of the filing of this RAA, with the exception of Board Order No. 142-05 and Board Order No. 131-138, there are no other well spacing, density, compulsory pooling or other orders of the Board affecting the Subject Lands, other than the general provisions of the UDOGM Rules regarding drilling units and well spacing.

7. As of the filing of this RAA, there are no V Wells, SLHZ Wells or LLHZ Wells located on and/or producing from the Subject Formations on the Order 142-05 Lands, pursuant to Board Order No. 142-05 or the UDOGM Rules.

8. As of the filing of this RAA, the only V Well, SLHZ Well or LLHZ Well located on and/or producing from the Subject Formations on the Order 131-138 Lands, pursuant to Board Order No. 131-138, are as follows (collectively, "Horizontal Wells"):

(a) Lamb 13-10-4-2E-DC Well, API No. 43-047-55125, with a surface location in the NW/4NW/4, Section 15, Township 4 South, Range 2 East, U.S.M., producing from the Subject Formation, via a horizontal wellbore;

(b) Lamb 13.5-10-4-2E-BS Well, API No. 43-047-55126, with a surface location in the NW/4NW/4, Section 15, Township 4 South, Range 2 East, U.S.M., producing from the Subject Formation, via a horizontal wellbore;

(c) Kendall State 14-4-3-1E-WS Well, API No. 43-047-53114, with a surface location in the NW/4NE/4, Section 9, Township 3 South, Range 1 East, U.S.M., producing from the Subject Formation, via a horizontal wellbore; and

(d) Kendall 2-18-3-1E-CP Well, API No. 43-047-55113, with a surface location in the SW/4SE/4, Section 7, Township 3 South, Range 1 East, U.S.M., producing from the Subject Formation via a horizontal wellbore.

9. As of the filing of this RAA, the only V Wells, SLHZ Wells or LLHZ Wells located on and/or producing from the Subject Formations on the Subject Lands, pursuant to the UDOGM Rules, are as follows (collectively, “Vertical Wells”):

(a) Kendall 1-18-3-1E Well, API No. 43-047-53097, located in the NE/4NE/4, Section 18, Township 3 South, Range 1 East, U.S.M., producing from the Wasatch Formation, via a vertical wellbore;⁴

(b) Merritt 3-18-3-1E Well, API No. 43-047-52967, located in the NE/4NW/4, Section 18, Township 3 South, Range 1 East, U.S.M., producing from the Wasatch Formation, via a vertical wellbore;⁵

(c) Kendall 9-18-3-1E Well, API No. 43-047-53095, located in the NE/4SE/4, Section 18, Township 3 South, Range 1 East, U.S.M., producing from the Lower Green River-Wasatch Formations, via a vertical wellbore;⁶

⁴ Located on the Order 131-138 Lands.

⁵ Located on the Order 131-138 Lands.

⁶ Located on the Order 131-138 Lands.

(d) Cox 12-31-3-1E Well, API No. 43-047-54797, located in Lot 6 (SE/4SE/4), Section 31, Township 3 South, Range 1 East, U.S.M., producing from the Lower Green River-Wasatch Formations, via a vertical wellbore;

(e) Ute Tribal 11-4-4-2E Well, API No. 43-047-52197, located in the NE/4SW/4, Section 14, Township 4 South, Range 2 East, U.S.M., producing from the Lower Green River-Wasatch Formations, via a vertical wellbore; and

(f) Gardner State 1-26-3-2E Well, API No. 43-047-55108, located in the NE/4NE/4, Section 26, Township 3 South, Range 2 East, U.S.M., producing from the Lower Green River-Wasatch Formations, via a vertical wellbore.

10. As of the filing of this RAA, with the exception of the Horizontal Wells and the Vertical Wells (collectively, "Existing Wells"), there are no other wells drilled or producing from the Subject Formations on the Subject Lands.

11. Based upon the information and data obtained through CPE's drilling of the Horizontal Wells in the 640-acre drilling units currently-established for each of the Horizontal Wells pursuant to Board Order No. 131-138, CPE believes and alleges that:

(a). The drilling and production of SLHZ Wells and LLHZ Wells in the requested 640 DUs and 1,280 DUs will result in production and productivity increases, and cost effectiveness, over the drilling and production of V Wells alone, and will allow access to additional resources in the Subject Formations that would not otherwise be recovered;

(b). The average effective hydraulic fracture half lengths and average orientation confirm that: (i) producing interval setbacks of three hundred thirty feet (330') laterally from the north and south boundaries of each 640 DU or 1,280 DU so established; (ii) producing interval setbacks of five hundred sixty feet (560') laterally from the east and west

boundaries of each 640 DU or 1,280 DU so established; (iii) producing interval setbacks of three hundred thirty feet (330') laterally from the producing interval of any authorized Existing Well wellbore, V Well wellbore, SLHZ Well wellbore or LLHZ Well wellbore within the same 640 DU or 1,280 DU; (iv) no interwell producing interval setback distance laterally within the 640 DUs or 1,280 DUs so established with respect to "stacked" SLHZ Well wellbores and LLHZ Well wellbores; and (v) producing interval setbacks of one hundred feet (100') vertically from the producing interval of any authorized "stacked" SLHZ Well wellbore or LLHZ Well wellbore within 640 DUs or 1,280 DUs will collectively result in efficient but limited communication between Existing Well wellbores, V Well wellbores, SLHZ Well wellbores or LLHZ Well wellbores, and allow greater flexibility in locating V Wells, SLHZ Wells or LLHZ Wells upon the Subject Lands, while still protecting correlative rights;

(c) It is difficult, if not impossible, to establish uniform producing interval setbacks between Existing Well wellbores, V Well wellbores, SLHZ Well wellbores or LLHZ Well wellbores, but the same may be required to maximize resource recovery from the Subject Formations, and the separation of individual production intervals within the pool of the Subject Formations discussed below would require separate metering and create additional administrative burdens to either prevent, or effect, the commingling of production from the Subject Formations;

(d) In order to maximize the recovery of resources from the Subject Formations: (i) up to sixteen (16) V Wells in each 640 DU so established; (ii) up to thirty-two (32) V Wells in each 1,280 DU so established, to be concurrent with, and not in addition to, any Vertical Wells and V Wells drilled in each such 1,280 DU so established; (iii) up to twelve (12) SLHZ Wells in each 640 DU so established, to be concurrent with, and not in addition to, any

Horizontal Wells drilled in each 640 DU so established; and (iv) up to twelve (12) LLHZ Wells in each 1,280 DU so established, to be concurrent with, and not in addition to, any Horizontal Wells and SLHZ Wells drilled in each such 1,280 DU so established, is necessary to allow flexibility in the drilling of wells and to allow the maximum recovery of resources from all intervals found within the Subject Formations.

12. Based on the foregoing, CPE believes and alleges that in order to afford the continued protection of the correlative rights of the owners of interests in the Subject Lands: (a) the Subject Formations should be declared a “common source of supply” as contemplated by Utah Code Ann. § 40-6-2(18), such that all production, regardless of whether originating from Existing Wells, V Wells, SLHZ Wells and/or LLHZ Wells, should be allocated over the entire 640 DU and 1,280 DU, respectively and (b) that such allocation should become effective: (i) on the date of issuance of the same with respect to V Wells, SLHZ Wells, LLHZ Wells and Horizontal Wells and (ii) on the date in which a SLHZ Well or LLHZ Well is drilled and obtains production in commercial quantities in a subject 640 DU or 1,280 DU with respect to Vertical Wells.

13. Due to the presence of oil and gas leases issued by the United States Bureau of Indian Affairs (“BIA”) by Tribal and/or Allottee lessors in all of the Subject Lands, the preparation and execution of multiple communitizatiuon agreements will be required (whether by regulation and guideline, or through BIA practice), a prerequisite of which is the establishment of the requested 640 DUs and 1,280 DUs.

14. CPE respectfully asserts that the granting this RAA will further the public policies of the State of Utah to promote greater recovery of oil, gas and associated hydrocarbons from the Subject Formations without waste and with protection of the correlative rights of all affected

owners, constitutes orderly and consistent development of the Subject Lands, and is just and reasonable under the circumstances.

15. In accordance with the UDOGM Rules, CPE will timely submits exhibits and present testimony in support of the allegations and statements set forth in this RAA.

16. CPE will separately file a certificate of mailing listing all parties known to it, based upon its reasonable search of the Uintah County, Utah records and the records of the Division, whose legally protected interests may be affected by this Request.

17. As of the filing of this RAA, CPE knows of no respondents or adverse parties to this RAA.

WHEREFORE, CPE respectfully requests that:

I. This matter be set for hearing on October 28, 2015, in Salt Lake City, Utah (“Hearing”);

II. Notice of the Hearing be given as provided by law; and

III. Upon production of sufficient evidence and testimony given at the Hearing, the Board issue an order:

A. Partially vacating Board Order No. 142-05 as to the Order No. 142-05 Lands;

B. Vacating Board Order No. 131-138 in its entirety;

C. Establishing forty-nine (49) 640 DUs comprised of the 640 DU Lands;

D. Establishing eighteen (18) 1,280 DUs comprised of the 1,280 DU Lands;

E. Allowing the drilling and production of a maximum of sixteen (16) V Wells in each 640 DU so established;

F. Allowing the drilling and production of a maximum of thirty-two (32) V Wells in each 1,280 DU so established, to be concurrent with, and not in addition to, any Vertical Wells and V Wells drilled in each such 1,280 DU so established;

G. Allowing the drilling and production of a maximum of twelve (12) SLHZ Wells in each 640 DU so established, to be concurrent with, and not in addition to, any Horizontal Wells drilled in each 640 DU so established;

H. Allowing the drilling and production of a maximum of twelve (12) LLHZ Wells in each 1,280 DU so established, to be concurrent with, and not in addition to, any Horizontal Wells and SLHZ Wells drilled in each such 1,280 DU so established;

I. Providing that V Wells shall be drilled and produced within the 640 DUs and 1,280 DUs pursuant to the UDOGM Rules, including UDOGM Rule R649-3-2, which provides that a V Well may be located in the center of any governmental quarter-quarter section, with a four hundred foot (400') window of tolerance and no closer than nine hundred twenty feet (920') to another vertical well producing in the same formation, absent an exception location approval by the Board pursuant to UDOGM Rule R649-3-3;

J. Providing that no producing interval of an authorized SLHZ Well wellbore or LLHZ Well wellbore may be located: (1) closer than three hundred thirty feet (330') laterally from the north and south boundaries of each 640 DU or 1,280 DU so established; (2) closer than five hundred sixty feet (560') laterally from the east and west boundaries of each 640 DU or 1,280 DU so established; or (3) closer than three hundred thirty feet (330') laterally from the producing interval of any authorized Existing Well wellbore, V Well wellbore, SLHZ Well wellbore or LLHZ Well wellbore within the same 640 DU or 1,280 DU, absent an exception location approval by the Board pursuant to UDOGM Rule R649-3-3;

K. Providing that “stacked” SLHZ Well wellbores and LLHZ Well wellbores within any 640 DU or 1,280 DU so established shall have no interwell producing interval setback distance laterally within the subject 640 DU or 1,280 DU, but no producing interval of an authorized SLHZ Well wellbore or LLHZ Well wellbore within such 640 DU or 1,280 DU may be located closer than one hundred feet (100’) vertically from the producing interval of another authorized “stacked” SLHZ Well wellbore or LLHZ Well wellbore within such 640 DU or 1,280 DU, absent an exception location approval by the Board pursuant to UDOGM Rule R649-3-3;

L. Providing that the surface location of any authorized V Well, SLHZ Well or LLHZ Well may be located: (1) anywhere within any 640 DU or 1,280 DU so established or (2) (excepting V Wells) outside of such 640 DU or 1,280 DU so established, subject to the acquisition of proper surface and subsurface estate authorizations and the casing/cementing of any SLHZ Well wellbore or LLHZ Well wellbore to the three hundred thirty foot (330’) producing interval setback set forth in Paragraph J immediately above, both of which shall be evidenced by a self-certification of the same executed by the operator of such 640 DU or 1,280 DU and filed with the Division, and provided that the other producing interval setbacks set forth in Paragraph J immediately above are otherwise maintained;

M. Declaring: (1) that the Subject Formations are a “common source of supply” as contemplated by Utah Code Ann. § 40-6-2(18); (2) that all production, regardless of whether originating from Existing Wells, V Wells, SLHZ Wells and/or LLHZ Wells, be allocated over the entire 640 DU and 1,280 DU so established, respectively; and (3) that such allocation should become effective: (a) on the date of issuance of the same with respect to V Wells, SLHZ Wells, LLHZ Wells and Horizontal Wells and (b) on the date in which a SLHZ

Well or LLHZ Well is drilled and obtains production in commercial quantities in a subject 640 DU or 1,280 DU with respect to Vertical Wells.

N. Making such findings and orders in connection with this RAA as it deems otherwise necessary; and

O. Providing for such other and further relief as may be just and equitable under the circumstances.

Respectfully submitted this 9th day of September, 2014.

FOX ROTHSCHILD LLP


BRENT D. CHICKEN (UT Bar # 14927)
JACK R. LUELLEN (UT Bar # 10880)

1225 17th Street
Suite 2200
Denver, CO 80202
Phone: (303) 446-3843
Email: bchicken@foxrothschild.com
Email: jluellen@foxrothschild.com

Attorneys for Petitioner Crescent Point
Energy U.S. Corporation

Petitioner's Address:

Crescent Point Energy U.S. Corporation
555 17th Street
Suite 1800
Denver, CO 80202